

## LAW OFFICES OF JILL R. SHELLOW

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January 29, 2021

**BY ECF AND EMAIL**

The Honorable Laura T. Swain  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007  
[SwainNYSDCorresp@nysd.uscourts.gov](mailto:SwainNYSDCorresp@nysd.uscourts.gov)

**MEMO ENDORSED**

**RE: *United States v. Constantinescu, et al.*, 19-cr-651 (LTS)**

Dear Judge Swain:

I am writing to request that Your Honor adjourn the February 9, 2021 status conference in this matter for approximately six weeks in order to provide additional time for reviewing discovery produced by the Government and engaging in discussions with the Government about a pretrial disposition. On behalf of Mr. Hanes Calugaru. I consent to the exclusion from the Speedy Trial Act calculation of time from February 9, 2021 until the new conference date. I have consulted with the Government, and the Government consents to this request.

Thank you for your consideration.

The application is granted. The conference is adjourned to March 23, 2021, at 9:00 a.m. The Court finds pursuant to 18 U.S.C. §3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through March 23, 2021, outweigh the best interests of the public and the defendant(s) in a speedy trial for the reasons stated above. DE# 473 resolved.

SO ORDERED.  
Dated: 1/29/2021  
/s/ Laura Taylor Swain  
Laura Taylor Swain, USDJ

Respectfully submitted,



Jill R. Shellow

cc: Alin Hanes-Calugaru (by legal mail)